

**Caplin & Drysdale**  
ATTORNEYS

Caplin & Drysdale, Chartered  
One Thomas Circle, NW, Suite 1100  
Washington, DC 20005  
202-862-5000 202-429-3301 Fax  
www.caplindrysdale.com

July 18, 2016

**VIA ELECTRONIC MAIL**

Ms. A'knea Smith  
Audit Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

**Re: Response of the Utah Republican Party to Findings Referenced in the  
Commission's Draft Final Audit Report**

Dear Ms. Smith:

In response to your request, the Utah Republican Party ("Party") submits this letter to address certain matters referenced in the June 30, 2016 Draft Final Audit Report ("Report"), which closely resembles the Interim Audit Report issued by the Commission's staff months earlier.

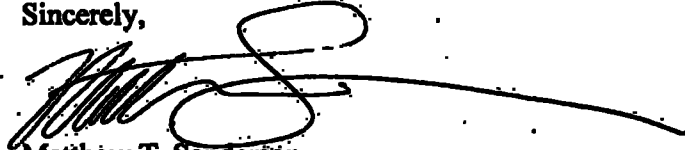
As the Party has previously mentioned, nearly all issues identified in the Report are already resolved. The Party, for example, remedied the issues identified in the Report under Findings 1 and 2, which were associated with simple contribution misdeposits, nearly two years ago. And the Party has already amended its disclosure reports, as it had previously offered to do, in response to recommendations by the Audit Division staff under Findings 3, 4, and 5.

The only remaining open issue appears to be related to Finding 6, in which the Audit Division asserts that the Party received an in-kind contribution from its former Executive Director, Ivan DuBois. Again, the Party strongly disagrees with this assertion. The Audit Division staff has remarked that these expenses were in-kind contributions by Mr. DuBois between the date they were incurred and the date they were reimbursed. But the Party was not aware of Mr. DuBois' reimbursable expenses when they were incurred. The Party knew, and could know, of these expenses only after Mr. DuBois presented receipts and/or expense reports to the Party's treasurer, which frequently occurred well after the underlying expenses were incurred. The Party's regular practice was to issue reimbursements to Mr. DuBois within a calendar week of this presentation. Given this practice, the Commission should not consider these expenses as in-kind contributions as of the date they were incurred. The Party is pleased to note that the Audit Division is recommending that "[n]o further action ... be taken since the staff member was eventually reimbursed for the expenses." The Party agrees with this recommended course of action.

Please notify me ([msanderson@capdale.com](mailto:msanderson@capdale.com); 202-862-5046) if you have any additional questions or need more information. The Party looks forward to concluding this lengthy process,

and it is willing to provide any assistance needed by the Commission to reach an expedited resolution.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew T. Sanderson', with a long horizontal flourish extending to the right.

Matthew T. Sanderson  
Member  
Caplin & Drysdale, Chartered